

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

MOHSEN MAHDAWI,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as president of the united states; PATRICIA HYDE, in her official capacity as acting Boston Field Office Director, Immigration And Customs Enforcement, Enforcement And Removal Operations; Vermont Sub-Office Director Of Immigration And Customs Enforcement, Enforcement And Removal Operations; TODD M. LYONS, in his official capacity as Acting Director, U.S. Immigration And Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary Of The United States Department Of Homeland Security; MARCO RUBIO, in his official capacity as Secretary Of State; AND PAMELA BONDI, in her official capacity as U.S. Attorney General,

Respondent.

Case No. 2:25-cv-00389

**PETITIONER'S UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF
MICHAEL K.T. TAN**

Pursuant to Rule 83.1(b)(2) of the Local Rules of Civil Procedure for the Federal District Court, District of Vermont, Petitioner respectfully moves this Honorable Court to admit Michael K.T. Tan as co-counsel for the Petitioner in this case.

In support of this motion Petitioner submits the Affidavit of Michael K.T. Tan and in Support of Motion for Admission *Pro Hac Vice* along with his certificate of good standing. In further support of this motion, Petitioner states as follows:

1. Local counsel, Lia Ernst, is a member in good standing of the Bar of the State of Vermont and the Bar of this Court;

2. Ms. Ernst vouches for the good moral character and veracity of Mr. Tan who seeks admission to this Court *pro hac vice*;

3. Ms. Ernst will continue to participate in this action and is fully prepared to represent the Petitioner at any time and in any capacity, and will provide a local office for service of papers as required by Local Rule 83.1(b)(4);

4. Mr. Tan is an attorney at the American Civil Liberties Union Foundation, 125 Broad Street, New York, NY 10004;

5. Mr. Tan is a member in good standing of the Bar of the State of New York. He has not been denied admission or disciplined in accordance with Local Rule 83.1(b)(2)(B)(iv), and have not otherwise been denied admission or disciplined by any state or federal court;

6. The granting of this motion will not require modification of any scheduling order entered pursuant to Fed. R. Civ. P. 16(b);

7. Mr. Tan has fully reviewed and is familiar with the Federal Rules of Civil and Criminal Procedure, the Local Rules of the District Court for the District of Vermont, and the Vermont Rules of Professional Conduct;

8. Pursuant to Local Rule 7(a)(7), undersigned counsel for Petitioner certifies that the U.S. Attorney's Office for the District of Vermont has been consulted and does not object to the relief requested; and

9. This motion is accompanied by payment in the amount of \$150.

WHEREFORE, Petitioner respectfully requests that attorney Michael K.T. Tan be admitted to practice before this Honorable Court *pro hac vice*.

Respectfully submitted,

Date: May 22, 2025

/s/ Lia Ernst
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